

ATTACHMENT #3 CLOSURE DOCUMENTS



INTER-ORGANIZATION MEMO

TO: File Memo
ATTENTION: T-1747
FROM: Keith Pearson
DATE: July 11, 1985
SUBJECT: Closure Plan for Waste
Solvent Drum Storage Area.

The following closure plan is established for the waste solvent drum storage facility at the Odessa plant:

- 335.211 The hazardous waste facility as shown on our notice of registration is; 03 Container Storage Area, storage for less than 90 days of waste numbers 1H910090 (acetone), 1H911080 (methanol), 1H910060 (toluene), 1H910200 (trichloroethane or tetrachloroethane).
- 335.212 Closure of this facility will be conducted in a manner that minimizes need for further maintenance and eliminates to the extent necessary to protect human health and the environment, post-closure escape of any hazardous material to groundwater, or surface water or to the atmosphere.

335.213 Waste Solvent Drum Storage

In the event of closure or replacement, the drums used to contain waste solvents will be emptied by approved carrier and material disposed of in a Class I disposal well in accordance with TDWR provisions. The empty solvent drums will be triple rinsed for disposal by a drum reclaiming company.

It is planned to replace the drum storage with a tank facility in August, 1985.

Maximum volume of solvent at any given time during operation of the facility is 700 gallons.

Closure of this facility can be accomplished in two weeks.

The closure plan will be amended when changes in operations or facility design effect the closure plan, or when there is a change in the expected year of closure. The amendment will be made within sixty days of the change requiring the amendment.

If time allows, closure plans will be submitted to the Executive Director at least 180 days before the expected date of closure or no later than 15 days after interim status or issuance of a judicial decree order under Section 3008 of RCRA or Section 8 of the Solid Waste Disposal Act, Article 4477-7 to cease operation of the facility and close.

File Memo
T-1747
Page #2

If closure is enacted by the company, the company is aware of its opportunity to submit written comments on the plan and request modification within 30 days of the date notice is required.

335.214 Time Allowed for Closure

The company will, after generating the final volume of hazardous waste, or 90 days after approval of the closure plan, remove from the site or dispose of onsite all hazardous waste, in accordance with the approved closure plan. Closure activities will be completed within 180 days. The company may request approval of a longer closure period using procedures under 335.213(c) if it can be demonstrated that he has taken and will continue to take all steps to prevent threats to human health and the environment from the unclosed but inactive facility.

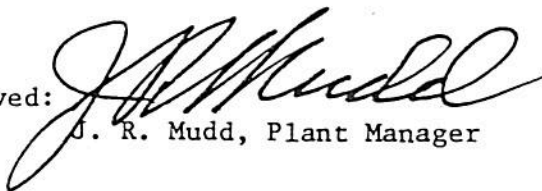
335.215 Disposal or Decontamination of Equipment -
See 335.212.

335.216 Certification of Closure

When closure is completed, the company will submit to the Executive Director certification by the company and an independent registered engineer that the hazardous waste facilities have been closed in accordance with specifications in the approved closure plan.


Keith Pearson,
Senior Process Engineer

Approved:


J. R. Mudd, Plant Manager

KP/ra

cc: J. R. Mudd
J. Y. Brown
S. M. Bughdadi
R. W. Frase



THE GENERAL TIRE & RUBBER COMPANY

CHEMICAL DIVISION

ODESSA, TEXAS 79760

P.O. Box 2032

Telephone 1-915-332-1462

September 5, 1985

File: T-1817

Mr. Larry R. Soward
Executive Director
Texas Water Commission
P.O. Box 13087 Capital Station
Austin, Tx. 78711

Re: Hazardous Waste Permit Application No. 10413
Solid Waste Registration No. 30252

Dear Mr. Soward:

We have been advised by Texas Department of Water Resources representative, Alice Hamilton Rogers, to close our popcorn polymer waste pile and incinerator as hazardous waste facilities by November 8, 1985 in order to avoid Part B permitting requirements. We hereby request permission to close these facilities in accordance with the attached closure plan.

We will appreciate your early and favorable reply. If you need additional information, please contact me at AC 915-335-7576.

Sincerely,

Keith Pearson
Senior Process Engineer

/st
attachments (2)

xc: J.P. Mudd
J.Y. Brown
S.M. Bughdadi
R.W. Frase



INTER-ORGANIZATION MEMO

TO: File Memo
ATTENTION: T-1823
FROM: Keith Pearson
DATE: September 5, 1985
SUBJECT: Closure Plan for Incinerator
and Popcorn Polymer Waste Pile.

The following closure plan is submitted for closure of hazardous waste facilities at the Odessa plant.

- 335.211 These hazardous waste facilities as currently shown on our notice of Registration are:
- 01 Incinerator - for burning ignitable waste IH982650 (popcorn polymer).
 - 04 Waste Pile - waste IH982650 (popcorn polymer) to be burned in incinerator.
- 335.212 Closure of these facilities will be conducted in a manner that minimizes need for further maintenance and eliminates to the extent necessary to protect human health and the environment, post-closure escape of any hazardous material to groundwater, or surface water or to the atmosphere.
- 335.213 Popcorn Polymer Waste Pile

All Popcorn polymer will be incinerated, at a rate within the limits of the capacity of the incinerator, such that no material remains. Incineration of popcorn polymer is commenced on the day it is removed from the vessels being cleaned. A soil sample will be analyzed for ash content to determine that no combustible material remains in the soil.

The popcorn polymer waste pile can be closed as a hazardous waste facility as soon as approval for closure is received. Maximum amount of popcorn polymer at any given time is estimated to be 1000 lbs.

Closure of the facility can be accomplished in two weeks.

Incinerator

Popcorn polymer will be incinerated, at a rate within the limits of the capacity of the incinerator, such that no polymer remains. An ash sample will be analyzed for ash content to assure that no combustible material remains in the ash. The ash will be removed from the incinerator and disposed of in the city landfill which is the current approved practice.

File Memo
T-1823
Sept. 5, 1985
Page #2

The incinerator can be closed as a hazardous waste facility as soon as approval for closure is received.

Maximum inventory of ash at any given time during the life of the facility is estimated at 9000 pounds.

Closure of the facility can be accomplished in two weeks.

If closure is enacted by the company, the company is aware of its opportunity to submit written comments on the plan and request modification within 30 days of the date notice is required.

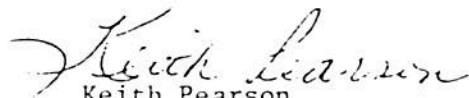
335.214 Time Allowed for Closure

The company will after generating the final volume of hazardous waste, or 90 days after approval of the closure plan, remove from the site or dispose of onsite all hazardous waste, in accordance with the approved closure plan. Closure activities will be completed within 180 days. The company may request approval of a longer closure period using procedures under 335.213(c) if it can be determined that he has taken and will continue to take all steps to prevent threats to human health and the environment from the unclosed but inactive facility.

335.215 Disposal or Decontamination of Equipment
See 335.212.

335.216 Certification of Closure

When closure is completed, the company will submit to the Executive Director certification by the company and an independent registered engineer that the hazardous waste facilities have been closed in accordance with specifications in the approved closure plan.


Keith Pearson,
Senior Process Engineer

Approved:


J. R. Mudd, Plant Manager

KP/ra

cc: J. R. Mudd
J. Y. Brown
S. M. Bughdadi
R. W. Frase

TEXAS WATER COMMISSION

Paul Hopkins, Chairman
Ralph Roming, Commissioner
John O. Houchins, Commissioner



Larry R. Soward, Executive Director
Mary Ann Hefner, Chief Clerk
James K. Rourke, Jr., General Counsel

December 17, 1985

Mr. Keith Pearson
Senior Process Engineer
Diversitech General
P. O. Box 2032
Odessa, Texas 79760

Dear Mr. Pearson:

Re: Full Facility Closure
Industrial Solid Waste Registration No. 30252

We have completed a review of your facility's closure plan for the drum storage area, the popcorn polymer incinerator and the popcorn polymer waste pile (Facility Unit Nos. 01 and 03 on your company's Notice of Registration, and the waste pile which should be added to your Notice of Registration) which was submitted by letters dated July 16 and September 5, 1985. Our review indicates that the closure plan for these units, along with the modifications stated herein, substantially conforms with the requirements of 31 Texas Administrative Code (TAC) 335 Subchapter J and should provide reasonable assurance of effective industrial solid waste management. This letter constitutes approval by the Executive Director of the closure plan, for the units described above.

The closure plan is hereby modified to include the following items:

1. Drum Storage Area

- a. The soil underneath the drum storage area should be removed until no visible contamination remains. The soil should then be sampled at a depth of six inches at three well-spaced locations as well as at three locations at an area of similar soil type that is unaffected by waste management activities.
- b. All six of these samples should be analyzed for toluene and trichloroethane using the analytical methods found in the EPA Publication "Test Methods for Evaluating Solid Waste" SW 846.
- c. The concentration values for the background samples should be averaged and the standard deviation found.
- d. The concentration values for the drum storage area samples should be compared to the background average. If each drum storage area sample concentration value falls within two standard deviations of the average,

Keith Pearson
Page 2
December 17, 1985

then the area shall be deemed clean. If any concentration value exceeds the average by more than two standard deviations, then the soil around that sample location shall be classified and removed to an appropriate waste disposal facility. The sampling should then be repeated and more soil removed, if necessary.

- e. If it is impossible or impractical to remove all waste, then Diversitech should submit a hazardous waste determination to the TWC so that the remaining soil can be classified and the area deeded recorded or closed as a landfill, if the classification indicates that such action is appropriate.

2. Popcorn Polymer Waste Pile

- a. The soil underneath the popcorn polymer waste pile shall also be sampled in three well-spaced locations, analyzed for Total Organic Carbon (TOC) and compared to three background samples using the statistical method described above.
- b. If contamination exists the soils should be removed as described above.

Should you have any questions regarding this matter, please contact Alice Hamilton Rogers of the Hazardous and Solid Waste Permits Section at AC512/463-8181.

Sincerely,



Bryan W. Dixon, P.E., Director
Hazardous and Solid Waste Division

AHR:lab

cc: Terry James, TWC District 10 Office - Odessa



DYNAGEN, INC.,
A Subsidiary of
GENERAL TIRE, INC.

SE-1064
April 15, 1986

Mr. Larry R. Soward
Executive Director
Texas Water Commission
PO Box 13087 Capitol Station
Austin, TX 78711

RE: Hazardous Waste Permit Application No. 10413
Solid Waste Registration No. 30252

Dear Mr. Soward:

We have completed closure of our waste solvent drum storage area and our incinerator and popcorn polymer waste pile as hazardous waste facilities in accordance with the approved closure plans. Attached is the certification by independent, Registered Engineer Foye Davis.

The incinerator and popcorn polymer waste pile were closed as hazardous waste facilities on the advice of Texas Water Commission representative Alice Rogers in order to avoid Part B permitting requirements. It was understood and agreed that the incinerator will continue to operate as a non-hazardous waste facility. Our Notice of Registration should reflect this change of status.

If you require any further information, please call me at 915/335-7522.

Sincerely,

Keith Pearson
Safety/Environmental Manager

KP:pm

cc: J. R. Mudd
R. W. Frase



INTER-ORGANIZATION MEMO

DYNAGEN, INC.,
A Subsidiary of
GENERAL TIRE, INC.

TO:

ATTENTION:

FROM:

DATE: April 15, 1986

SUBJECT:

This is to certify that I am familiar with the closure plans for DiversiTech General's waste solvent drum storage area and the incinerator and popcorn polymer waste pile. I have witnessed closure of these hazardous waste facilities which was conducted as prescribed in these closure plans.

Foye Davis
Registered Engineer

Registration No. 24569

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO: Betty Moore TWC	FROM: Fred Hunt	DATE: 7/8/86	TIME: 8:45
SUBJECT: Diversitech Gen. Tire & Rubbs TXD057422685			
SUMMARY OF COMMUNICATION			
<p>Facility was certified closed on April 15, 1986</p> <p>Area consist of White consist of</p> <ol style="list-style-type: none"> 1. Drum Storage area 2. Incinerator 3. Popcorn polishes waste pile 			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
<p>He will send me copies of:</p> <ol style="list-style-type: none"> 1. Hazardous waste notification state 2. Part A application 3. Closure plan 			
INFORMATION COPIES			
TO: JTB			



Polymers Division, DiversiTech General, A GenCorp Company
Formerly -

THE GENERAL TIRE & RUBBER COMPANY

CHEMICAL DIVISION

ODESSA, TEXAS
79760

P.O. Box 2032

Telephone 1-915-33-21462

July 16, 1985
File T-1756

Mr. Charles E. Nemir
Executive Director
Texas Department of Water Resources
P. O. Box 13087 Capitol Station
Austin, Texas 78711

Re: Hazardous Waste Permit Application No. 10413
Solid Waste Registration No. 30252

Dear Mr. Nemir:

In order to improve the management of waste laboratory solvents in compliance with TAC regulations, we are upgrading our waste solvent facility from drum container storage to a tank storage. We hereby request permission to close the drum storage facility in accordance with the attached closure plan.

It is anticipated that the new tank facility will be completed such that the drum storage facility will receive no hazardous wastes after July 24, 1985. Waste solvents in the facility at that time will be collected by an approved carrier and disposed of in the Cecos International Class I disposal well to comply with 31 Texas Administrative Code (TAC) 335.69, accumulation time. Final disposition of the empty drums will be delayed until we have received your approval of the closure plan.

In order to bring the waste solvent facility into compliance by August 29, 1985, as required by the TDWR inspection of May 14, 1985, and closure at least 90 days after final receipt of hazardous wastes, we regret that notification of at least 180 days before the date of closure is not possible. Our notice of registration and Part A application will be revised reflecting these changes in operation.

We will appreciate your early and favorable reply. If you have any questions, please contact me at AC 915/335-7576.

Sincerely,

Keith H. Pearson
Senior Process Engineer

/bp

Attachments - 2

TEXAS WATER COMMISSION

Paul Hopkins, Chairman
Ralph Roming, Commissioner
John O. Houchins, Commissioner



Larry R. Soward, Executive Director
Mary Ann Hefner, Chief Clerk
James K. Rourke, Jr., General Counsel

July 14, 1986

Mr. Keith Pearson
Dynagen, Inc.
P.O. Box 2032
Odessa, Texas 79760

Re: Certification of Full Facility Closure
Industrial Solid Waste Registration No. 30252

Dear Mr. Pearson:

We have received your letter of April 15, 1986 certifying that the drum storage area, incinerator, and popcorn polymer waste pile were closed as hazardous waste facilities in accordance with the approved closure plans. Based on the information provided it appears that the incinerator, drum storage area, and popcorn polymer waste piles (Facility Units 01, 03, and 06 on the Notice of Registration) have been properly certified as closed in accordance with the approved closure plan.

We have enclosed an "Affidavit of Exclusion" form which must be completed before a final decision is made regarding the withdrawal of the facility's Part A application. We understand that the popcorn polymer will continue to be generated and that it is only hazardous if allowed to dry. In order to facilitate the processing of your Affidavit of Exclusion please provide a description of how the popcorn polymer will be processed to ensure that it does not develop hazardous characteristics.

Please note that a change to your Notice of Registration will be made reflecting the current status of the above units. Should you have any further questions, please contact Betty Moore of Facility Unit III at AC512/463-8174.

Sincerely,

A handwritten signature in cursive script, reading "Minor Brooks Hibbs".

Minor Brooks Hibbs, Chief
Permits Section
Hazardous and Solid Waste Division

BSM:af

Enclosure

cc: TWC District 10 Office - Odessa
Ray Austin, TWC - Austin

AFFIDAVIT OF EXCLUSION FROM HAZARDOUS WASTE PERMITTING REQUIREMENT

Registration No. 30252
Application No. _____
(Commission Use Only)
Facility Name Dynagen, Inc., A Subsidiary of General Tire, Inc.
County of Ector

_____ being duly sworn, deposes and says:
I am _____ of _____
Title (Owner or Principal Officer) Facility Owner
_____ and Address _____

This affidavit is being executed for the purpose of notifying the Executive Director of the Texas Water Commission that the named facility does not require a hazardous waste permit because:

Check appropriate box(es):

- ☐ No hazardous waste is stored, processed or disposed on-site
- ☒ The facility qualifies for the "Accumulation Time" storage exclusion of Texas Administrative Code, Section 335.69
- ☐ The facility qualifies for the "Small Quantity Generator" exclusion of Texas Administrative Code, Section 335.2(e)
- ☐ The facility qualifies for the "Elementary Neutralization Unit" exclusion of Texas Administrative Code, Section 335.2(f)
- ☐ The facility qualifies for the "Wastewater Treatment Unit" exclusion of Texas Administrative Code, Section 335.2(f)
- ☐ Other (Explain with an attachment and reference TWC rule)

Sworn to before me this

_____ day of _____, 198__.

Signature

Notary Public in and for

County, _____

My commission expires _____

File III A

TWC Reg. No. 30252

TEXAS WATER COMMISSION
Solid Waste Compliance Monitoring Inspection Report

INSPECTION COVER SHEET

SEP 02 1986 C.O. Use Only
09-86 LLS

TWC Dist. 10

EPA ID No. TXD057422685

COMMERCIAL WASTE Facility GOVT. Facility

NAME OF COMPANY Dynagen, Incorporated (General Tire)

MAILING ADDRESS P.O. Box 2032, Odessa, Texas 79760 Tel. 915/332-1462

SITE LOCATION South Grandview and Pool Road, Odessa, Texas Tel. 915/332-1462

COUNTY Ector TYPE OF INDUSTRY Rubber Manufacturer

GENERATOR CLASSIFICATION: Industrial ☒ Municipal

Part A Application submitted to the State? Yes ☒ No To EPA? Yes ☒ No
Affidavit of Exclusion submitted to the State? Yes ☒ No
Was a written exclusion granted by TWC? Yes No ☒ If yes, Date Under Review
Will this facility require a permit? Yes No ☒

CURRENT WASTE MANAGEMENT (Haz.-"H", Class I NonHaz.-"NH", Class II-"II", Class III-"III")

Generator H,NH,II Treatment Storage H,NH,II Disposal Transporter

HW EXEMPTIONS (check): 90-Day Storage ☒ Other

*SQG: Total HW Generation Per Month: <1000 kg. 1000-10000 kg.

HW Facilities (circle appropriate codes): C (T) SI WP LT LF I TT TR WDW O

HW Facilities (circle appropriate codes): C T SI (WP) LT LF (I) TT TR WDW O

Anomalies in the above information will be addressed by: (a) Enforcement in progress
(b) Central Office (c) District Office ☒ (d) Owner/Operator

Type of Inspection (circle): EV EB EC CL GW SA CD (FO) OT FE SQ SW

Inspector's Name and Title Terry James, Biologist II

Inspection Participants Keith Pearson, Safety/Environmental Manager

Date(s) of Inspection August 25, 1986

Approved: William F. Lockett District Manager
Signed: Terry James August 28, 1986
Inspector Terry James Date

* SQG- Small quantity generator, <10000 kg. of hazardous waste per month.

Section B - Special Conditions (335.75)

1. If generator has received from or transported to a foreign entity any hazardous waste, has the appropriate notice been filed with the EPA Regional Administrator? N/A X YES ___ NO ___
2. Was the waste manifested and signed by the foreign consignee? N/A X YES ___ NO ___
3. Has confirmation of waste transport out of the country been received by the generator? N/A X YES ___ NO ___

Section C - Recordkeeping and Reporting (335.9, .10, .13, .70-71)

1. Does the generator maintain the following records and reports (if applicable) for the necessary three years?
 - a. Shipping Manifests N/A X YES ___ NO ___
 - b. Monthly off-site shipment summaries N/A X YES ___ NO ___
 - c. Monthly on-site land disposal summaries N/A X YES ___ NO ___
 - d. Tests and analyses N/A X YES ___ NO ___
 - e. Annual reports N/A X YES ___ NO ___
2. Has generator submitted ~~exception reports~~ to TWC for any original (white) copies of manifests not received back? N/A X YES ___ NO ___
3. Have any spills, unauthorized discharges or threats of such discharges occurred? YES X NO ___
If yes, have they been reported?(335.4, .453) N/A ___ YES X NO ___
Have they been remedied?(335.453) Explain. N/A ___ YES X NO ___

+++ DO NOT COMPLETE SECTION D IF GENERATOR DISPOSES OF WASTES ON-SITE ONLY+++

Section D - Pretransport and Manifest Requirements (335.61-68)

1. Identify primary off-site disposal facilities:
N/A

2. Are off-site disposal facilities permitted or operating under interim status standards? N/A X YES ___ NO ___
3. Are TWC manifests properly completed? N/A X YES ___ NO ___

+++ STOP & SIGN HERE IF FACILITY QUALIFIES AS A SMALL QUANTITY GENERATOR +++

Signed: _____

GENERAL FACILITIES CHECKLISTSection A - General Site Information

- ***
1. Are any solid waste facilities located in the 100-year floodplain? NO X YES
 2. Describe land use within one mile Industrial, Residential
 3. Are there any **closed** or **abandoned** solid waste facilities? NO X YES
 4. Has proof of **deed recordation** of all on-site solid waste Land Disposal facilities been provided to TWC? N/A X YES NO
 5. Are all solid waste facilities compliant with TAC **general prohibitions**? YES X NO
SEE COMMENTS

NOTE: Attach Plant Map showing site orientation, waste management facilities, and major topographic features. Each facility component checklist should have a map or sketch attached.

+++ STOP & SIGN HERE IF THERE ARE NO RCRA FACILITIES ON-SITE +++
Signed: _____

Section B - Personnel Training

1. Does the owner/operator maintain proper personnel training records at the facility? N/A X YES NO
2. Do personnel training records include:
 - a. Job title and written job description of each position N/A X YES NO
 - b. Description of type and amount of training N/A X YES NO
 - c. Records of training given to facility personnel N/A X YES NO
3. Are personnel training records maintained for the appropriate length of time? N/A X YES NO
4. Is the training program adequate for response to emergencies? N/A X YES NO

*** An entry in this column indicates explanation/response is needed.

COMMENTS SHEET

Section C-3 / A-5 Facilities A chromium spill was discovered on the date of the last inspection of October 24, 1985. All contaminated soils have been removed to background levels, and the soils are contained in drums and on a plastic liner. Arrangements have been made with Cecos International in Louisiana for disposal. Cecos will pick up the soils on August 27, 1986 for shipment to Louisiana as a Class I Hazardous Waste. All waste shipments will be handled and manifested as hazardous wastes.

Section /

Section /

Section /

TEXAS WATER COMMISSION

Paul Hopkins, Chairman
Ralph Roming, Commissioner
John O. Houchins, Commissioner



Larry R. Soward, Executive Director
Mary Ann Hefner, Chief Clerk
James K. Rourke, Jr., General Counsel

August 28, 1986
Certified Mail-Return Receipt Requested
No. P 306 741 868

Dynagen, Incorporated
P.O. Box 2032
Odessa, Texas 79760

Attention: Keith Pearson,
Safety/Environmental Manager

Dear Mr. Pearson:

Re: Solid Waste Registration No. 30252, Ector County

On August 25, 1986, Texas Water Commission Investigator, Terry James of our District 10 office in Odessa, visited your facility to conduct an Industrial Solid Waste Compliance Inspection. During the investigation, your facility was found to be in compliance with the Industrial Solid Waste Rules of the Texas Water Commission.

Thank you for your time and courtesy extended to my investigator during the inspection. Should you have any questions, please feel free to contact me or Mr. James at the District 10 office in Odessa.

Sincerely,

A handwritten signature in cursive script that reads "William F. Lockey".

William F. Lockey,
District 10 Manager

WFL/lt

cc: TWC, Hazardous and Solid Waste Division - Austin

REPLY TO: DISTRICT 10 / 204-A W. 5TH STREET / ODESSA, TEXAS 79761 / AREA CODE 915/332-5122

IV

MEMORANDUM

SUBJECT: Diversitech General
TXD 057422685

FROM: Fred Humke (6H-CE)

TO: Linda Thompson (6H-CE)

THRU: Will Focht (6H-CE)

This facility should be considered O.K. under LOIS. The hazardous waste land disposal consisted of a waste pile, used to store popcorn polymer, and a drum storage area for solvents storage. The land disposal unit had not received D003 wastes since 11/08/85, and the drum storage area had not received wastes since 07/16/85. The closure plan was submitted on 09/05/85. The facility has certified closed.

The inspection revealed no apparent LOIS violations.

6H-CE:HUMKE:trb:x2850:08/23/86

File Code: _____

TEXAS WATER COMMISSION

Paul Hopkins, Chairman
Ralph Roming, Commissioner
John O. Houchins, Commissioner



Larry R. Soward, Executive Director
Mary Ann Hefner, Chief Clerk
James K. Rourke, Jr., General Counsel

DEC 17 1985

Mr. Keith Pearson
Senior Process Engineer
Diversitech General
P. O. Box 2032
Odessa, Texas 79760

AKR Rogers
RRH Russell
AKR Hibbs
AKR Newchurch
AKR Dixon

Dear Mr. Pearson:

Re: Full Facility Closure
Industrial Solid Waste Registration No. 30252

We have completed a review of your facility's closure plan for the drum storage area, the popcorn polymer incinerator and the popcorn polymer waste pile (Facility Unit Nos. 01 and 03 on your company's Notice of Registration, and the waste pile which should be added to your Notice of Registration) which was submitted by letters dated July 16 and September 5, 1985. Our review indicates that the closure plan for these units, along with the modifications stated herein, substantially conforms with the requirements of 31 Texas Administrative Code (TAC) 335 Subchapter J and should provide reasonable assurance of effective industrial solid waste management. This letter constitutes approval by the Executive Director of the closure plan, for the units described above.

The closure plan is hereby modified to include the following items:

1. Drum Storage Area

- a. The soil underneath the drum storage area should be removed until no visible contamination remains. The soil should then be sampled at a depth of six inches at three well-spaced locations as well as at three locations at an area of similar soil type that is unaffected by waste management activities.
- b. All six of these samples should be analyzed for toluene and trichloroethane using the analytical methods found in the EPA Publication "Test Methods for Evaluating Solid Waste" SW 846.
- c. The concentration values for the background samples should be averaged and the standard deviation found.
- d. The concentration values for the drum storage area samples should be compared to the background average. If each drum storage area sample concentration value falls within two standard deviations of the average,

DEC 17 1985

then the area shall be deemed clean. If any concentration value exceeds the average by more than two standard deviations, then the soil around that sample location shall be classified and removed to an appropriate waste disposal facility. The sampling should then be repeated and more soil removed, if necessary.

- e. If it is impossible or impractical to remove all waste, then Diversitech should submit a hazardous waste determination to the TWC so that the remaining soil can be classified and the area deeded recorded or closed as a landfill, if the classification indicates that such action is appropriate.

2. Popcorn Polymer Waste Pile

- a. The soil underneath the popcorn polymer waste pile shall also be sampled in three well-spaced locations, analyzed for Total Organic Carbon (TOC) and compared to three background samples using the statistical method described above.
- b. If contamination exists the soils should be removed as described above.

Should you have any questions regarding this matter, please contact Alice Hamilton Rogers of the Hazardous and Solid Waste Permits Section at AC512/463-8181.

Sincerely,

Bryan W. Dixon, P.E., Director
Hazardous and Solid Waste Division

AHR:lab

cc: Terry James, TWC District 10 Office - Odessa

ATTACHMENT III

LOSS OF INTERIM STATUS
REGION VI EPA
R06-01-06

1. Reviewer: DGS
2. Facility name: DIVERSITECH GENERAL
3. Address/location: P.O. Box 2032
Odessa, TX, 79760
4. EPA I.D. No.: TXD 057400685
5. Type of RCRA units requiring certification:
- | | |
|---------------|----------|
| A.* <u>WP</u> | H. _____ |
| B. _____ | I. _____ |
| C. _____ | J. _____ |
| D. _____ | K. _____ |
| E. _____ | L. _____ |
| F. _____ | M. _____ |
| G. _____ | N. _____ |

*see 22

Yes No Not
Determined

6. Is groundwater certification required? If yes, continue to Question 7. If no, go to Question 22.
7. Is financial assurance certification required? If yes, continue to Question 8. If no, go to Question 22.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- | | Yes | No | Not
Determined |
|--|--------------------------|--------------------------|--------------------------|
| 8. Was groundwater certification submitted? If yes, continue to Question 9. If no, answer Questions 9, 10, 11, and 12, and go to Question 20. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Was financial assurance certification submitted? If yes, continue to Question 10. If no, answer Questions 10, 11, and 12 and go to Question 20. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Is signature adequate? If yes, continue to Question 11. If no, answer Questions 11 and 12 and go to Question 22. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

11. Documentation available?

- | | | | | |
|----------------------------------|----------------|-------------------------------------|-------------------------------------|--------------------------|
| a. Part A Submittal - Date: | <u>8/12/80</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Part 3 Submittal - Date: | _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Topographic Map - | _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Section 3007 Response - Date: | _____ | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Closure Plan - Date: | <u>9/5/85</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Post-Closure Plan - Date: | _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g. RCRA Inspection - Date: | _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h. Other - | Signed _____ | Received _____ | | <input type="checkbox"/> |
| i. Certification Date: | _____ | | | |
| ii. * Date: | _____ | | | |
| iii. Date: | _____ | | | |
| iv. Date: | _____ | | | |
| v. Date: | _____ | | | |

* TWC CORRESPONDENCE FILES

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| 12. Do all documents listed in Question 11 agree with the information shown in Question 5? If yes, continue to Question 13. If no, go to Question 22 and check with Project Manager before continuing with questionnaire. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. Does groundwater certification properly address all units listed in Question 5? If yes, continue to Question 14. If no, go to Question 22. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Yes No Not Determined

14. Does financial assurance certification (insurance and closure/post-closure) properly address all units listed in Question 5? If yes, continue to Question 15. If no, go to Question 22.

☐ ☐ ☐

15. Does insurance address both sudden and non-sudden occurrences? If yes, continue to Question 16. If no, go to Question 22.

☐ ☐ ☐

16. Which of the following options were used to demonstrate financial assurance for closure? Note: check yes for the appropriate method - it is not necessary to check No for those which do not apply.

Closure Cost

Insurance Available Part B

- a. Closure trust fund:
- b. Surety bond guaranteeing payment into a closure trust fund:
- c. Surety bond guaranteeing performance:
- d. Closure letter of credit:
- e. Closure insurance:
- f. Financial test/corporate guarantee:
- g. Multiple financial mechanisms:

☐ ☐ ☐

☐ ☐ ☐

☐ ☐ ☐

☐ ☐ ☐

☐ ☐ ☐

☐ ☐ ☐

☐ ☐ ☐

17. Which of the following options were used to demonstrate financial assurance for post-closure? Note: Check yes for the appropriate method - it is not necessary to check no for those which do not apply.

Post Closure Cost

Insurance Available Part B

- | | Yes | No | Not Determined |
|--|--------------------------|--------------------------|--------------------------|
| a. Post-closure trust fund: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Surety bond guaranteeing payment into a post-closure trust fund: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Surety bond guaranteeing performance: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Post-closure letter of credit: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Insurance: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Financial test/corporate guarantee: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g. Multiple financial mechanisms: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 18. ^{GROUNDWATER} Is certification considered complete? If no, explain in Question 22. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 19. Is financial assurance considered complete? If no, explain in Question 22. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 20. If the answer to Questions 8, 9, 18, or 19 is no, was a closure plan submitted? If yes, continue to Question 21. If no, go to Question 22. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 21. If the answer to Questions 8, 9, 18, or 19 is no, was a post-closure plan submitted? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 22. Briefly discuss the problems or discrepancies identified and determine if they are of a nature which prevents further review. | | | |

5) A closure plan for the waste pile was submitted to TWC on 9/5/85. The plan was approved by TWC on 12/18/85.



THE GENERAL TIRE & RUBBER COMPANY

CHEMICAL DIVISION

ODESSA, TEXAS 79760

P.O. Box 2032

Telephone 1-915-332-1462

October 7, 1985
File No. T-1861

Mr. Dwight C. Russell, Head
Facility Unit III
Permits Section
Hazardous and Solid Waste Division
Texas Water Commission
P.O. Box 13087 Capitol Station
Austin, Texas 78711

Dear Mr. Russell,

Re: Notification of Facility Closure
Solid Waste Registration No. 30252

The Notice of Final Facility Closure for our drum solvent storage facility, popcorn polymer incinerator and popcorn polymer waste pile was published in the Odessa American on October 5, 1985. Enclosed are the Original sworn affidavit from the newspaper and the published notice. These facilities will be closed upon receipt of your approval.

Sincerely,

Keith Pearson
Senior Process Engineer

/bp

xc J. R. Mudd
J. Y. Brown
S. M. Bughdadi
R. W. Frase - Akron

Xc: Dist 10 - 10/21/85 AKR

PUBLISHER'S AFFIDAVIT

STATE OF TEXAS

COUNTY OF Ector

Before me on this day personally appeared R.M.Cole
General Manager, the General Manager of the
The Odessa American, a newspaper
which is regularly published or circulated in Ector County, Texas,
who being by me duly sworn deposes and says:

That the foregoing notice was published in said newspaper
on Ocotber 5, 1985, 1985

R.M.Cole
R.M.Cole, General Manager

Subscribed and sworn to before me this the 3rd day of Ocotber, 1985

Chris Thum
Notary Public in and for Ector
County, Texas

RECEIVED
OCT -9 1985
TEXAS WATER
COMMISSION



THE GENERAL TIRE & RUBBER COMPANY

CHEMICAL DIVISION

ODESSA, TEXAS 79760

P.O. Box 2032

Telephone 1-915-332-1462

September 9, 1985

File No. T-1833

Mr. Jay Snow, P. E. Chief
Industrial Solid Waste Section
Texas Water Commission
P. O. Box 13087 Capitol Station
Austin, Texas 78711

Dear Mr. Snow,

Re: Hazardous Waste Permit Application No. 10413
Solid Waste Registration No. 30252

Reference recent telephone conversations with Alice Hamilton Rogers of the Texas Water Commission regarding our request for Part B permit exclusion. The following items are attached to support our exemption request:

1. Procedure for incineration of popcorn polymer specifying that polymer will be placed on the concrete pad, and that popcorn is incinerated beginning the day it is removed from vessels.
2. Copy of a letter to Mr. Minor Hibbs updating our notice of registration including the popcorn polymer waste pile.
3. Copy of a letter to Mr. Dick Martin requesting Class II classification of popcorn polymer as non-hazardous waste.
4. Copy of a letter to Mr. Larry Soward requesting permission to close the incinerator and popcorn polymer waste pile as hazardous waste facilities.
5. Closure plan for the incinerator and popcorn polymer waste pile.

We appreciate your assistance toward qualifying for the Part B permit exemption. If you need additional information, please contact me at AC 915-335-7576.

Sincerely,

Keith Pearson
Senior Process Engineer

/bp

xc J. R. Mudd
J. Y. Brown

S. M. Bughdadi
R. W. Frase

DATE ISSUED 9-09-85	DIVERSITECH GENERAL POLYMERS DIVISION - ODESSA, TEXAS MANUAL OF PROCEDURE PRODUCTION OPERATING MANUAL	PROCEDURE NUMBER 2460.2 P
DATE EFFECTIVE 9-09-85		UNIT TRADE WASTE
SUPERSEDES ISSUE OF 7-19-85		PAGE 1 OF 3

INCINERATION OF POPCORN POLYMER

I. Introduction


Popcorn polymer has the potential to become a hazardous waste due to its characteristic of ignitability, if allowed to become hot and dry. In order to prevent popcorn polymer becoming a hazardous material, it will be incinerated using the following guidelines:

II Procedure


- A. Popcorn polymer will be placed on the concrete pad west of the incinerator as vessels are being cleaned.
- B. Incineration of the popcorn polymer will begin the day it is removed from vessels.
- C. The incinerator will be operated as described in Procedure 2460.0 P.
- D. Popcorn polymer will not be allowed to remain in the area longer than absolutely necessary as limited by the capacity of the incinerator.
- E. Utility personnel must empty popcorn from polyethylene bags to prevent heat buildup and allow wet down of material.

III. Inspection of Popcorn Polymer at Incinerator

- A. The incinerator area will be inspected by the Outside Head Operator if and when popcorn polymer is in the area for incineration. The 8/4 and the 4/12 shifts will make two inspections per shift. Observations of the popcorn polymer waste site will be recorded on the "Inspection of Popcorn Polymer at Incinerator" form.
- B. Items to be looked for and recorded are:
 1. Smoke or other indication that material is on the verge of igniting.
 2. Dryness and heat of material making it more susceptible to ignition.
- C. Action to be taken to correct any observed problem will also be noted on the form.
- D. If a serious condition exists for potential ignition of the popcorn polymer, wet down the popcorn with the fire hose to minimize the chance of a fire.

DATE ISSUED	7-19-85	 DIVERSITECH GENERAL MANUAL OF PROCEDURE PRODUCTION OPERATING MANUAL	PROCEDURE NUMBER - 2460.2
DATE EFFECTIVE	7-19-85		UNIT TRADE WASTE
SUPERSEDES ISSUE OF	4-24-85		PAGE 2 of 2

- E. An estimate as to the amount of popcorn polymer at the incinerator is to be recorded on the inspection form once a day by the 4/12 shift. Base the estimate on 1000 pounds per waste hopper load.
- F. The operator making the inspection will initial the form for the date and time of inspection.
- G. Inspection forms will be forwarded to the office of the Environmental Manager on a weekly frequency.


J. Y. Brown
 Technical/Quality Superintendent


K. L. Pietsch
 Production Superintendent

Forward form to Environmental Manager every Monday morning.
Rev. 9-5-85
KHP/bp

KHP/br



THE GENERAL TIRE & RUBBER COMPANY

CHEMICAL DIVISION

ODESSA, TEXAS 79760

P.O. Box 2032

Telephone 1-915-332-1462

September 4, 1985

File: T-1819

Mr. Minor B. Hibbs
Texas Water Commission
1700 North Congress Ave.
Austin, Tx. 78711

Dear Mr. Hibbs:

Reference: Hazardous Waste Permit Application No. 10413
Solid Waste Registration No. 30252

The following changes in our registration are requested reflecting current hazardous waste management activities:

1. In order to bring the waste solvent storage area into compliance, facility 03 is being upgraded to a tank facility for storage of less than 90 days. The new tank facility will comply with TAC Sections 335.261-335.267. The new waste solvent tank facility should be added to our registration.

A request to close the container storage facility 03 and closure plan has been submitted to the Texas Department of Water Resources Executive Director, Charles Nemir. You will be notified when closure is completed.

2. The Texas Department of Water Resources Self-reporting Subunit has requested that spent solvents, Texas Waste Code 910100, be added to our registration for our Monthly Waste Shipment Summary. The spent solvent is the mixture of all of the individual solvents currently on our registration; acetone (910090), methanol (911080), toluene (910060), and trichloroethane or tetrachloroethane (910200).
3. The popcorn polymer waste pile should be added to the registration per Texas Department of Water Resources representative, Alice Hamilton Rogers. The waste pile exists intermittently as incineration of popcorn polymer begins the day it is removed from vessels, and remains in the pile no longer than necessary as limited by the capacity of the incinerator.

Sincerely,

Keith Pearson
Keith Pearson
Senior Process Engineer

/st

xc: J.R. Mudd J.Y. Brown
S.M. Bughdadi R.W. Frase



THE GENERAL TIRE & RUBBER COMPANY

CHEMICAL DIVISION

ODESSA, TEXAS 79760

P.O. Box 2032

Telephone 1-915-332-1462

September 5, 1985

File: T-1818

Mr. Dick Martin
Texas Water Commission
P.O. Box 13087, Capital Station
Austin, Tx. 78711

Re: Hazardous Waste Permit Application No. 10413
Solid Waste Registration No. 30252

Dear Mr. Martin:

Popcorn polymer is presently classified as a class I hazardous waste by virtue of ignitability, EPA hazardous waste classification D001. We have been advised by Texas Department of Water Resources representative, Alice Hamilton Rogers, to have popcorn polymer reclassified as a non-hazardous waste to eliminate the requirement for Part B permitting.

Popcorn polymer is incinerated while wet, as soon as it is removed from vessels such that it is not allowed to become hazardous by drying out. No material classified as popcorn polymer has ignited with our standard waste management procedure. Popcorn polymer as managed at the Odessa plant does not meet the criteria of ignitability as described in 40 CFR 261.21 (a)(2).

We are therefore requesting a class II classification for this solid waste. If additional information is needed, please contact me at 915-335-7576. Your early and favorable response will be appreciated.

Sincerely,

Keith Pearson
Senior Process Engineer

/st

xc: J.R. Mudd
J.Y. Brown
S.M. Bughdadi
R.W. Frase



THE GENERAL TIRE & RUBBER COMPANY

CHEMICAL DIVISION

ODESSA, TEXAS 79760

P.O. Box 2032

Telephone 1-915-332-1462

September 5, 1985

File: T-1817

Mr. Larry R. Soward
Executive Director
Texas Water Commission
P.O. Box 13087 Capital Station
Austin, Tx. 78711

Re: Hazardous Waste Permit Application No. 10413
Solid Waste Registration No. 30252

Dear Mr. Soward:

We have been advised by Texas Department of Water Resources representative, Alice Hamilton Rogers, to close our popcorn polymer waste pile and incinerator as hazardous waste facilities by November 8, 1985 in order to avoid Part B permitting requirements. We hereby request permission to close these facilities in accordance with the attached closure plan.

We will appreciate your early and favorable reply. If you need additional information, please contact me at AC 915-335-7576.

Sincerely,

Keith Pearson
Senior Process Engineer

/st
attachments (2)

xc: J.R. Mudd
J.Y. Brown
S.M. Bughdadi
R.W. Frase



INTER-ORGANIZATION MEMO

TO: File Memo
ATTENTION: T-1823
FROM: Keith Pearson
DATE: September 5, 1985
SUBJECT: Closure Plan for Incinerator
and Popcorn Polymer Waste Pile.

The following closure plan is submitted for closure of hazardous waste facilities at the Odessa plant.

335.211 These hazardous waste facilities as currently shown on our notice of Registration are:

- 01 Incinerator - for burning ignitable waste IH982650 (popcorn polymer).
- 04 Waste Pile - waste IH982650 (popcorn polymer) to be burned in incinerator.

335.212 Closure of these facilities will be conducted in a manner that minimizes need for further maintenance and eliminates to the extent necessary to protect human health and the environment, post-closure escape of any hazardous material to groundwater, or surface water or to the atmosphere.

335.213 Popcorn Polymer Waste Pile

All Popcorn polymer will be incinerated, at a rate within the limits of the capacity of the incinerator, such that no material remains. Incineration of popcorn polymer is commenced on the day it is removed from the vessels being cleaned. A soil sample will be analyzed for ash content to determine that no combustible material remains in the soil.

The popcorn polymer waste pile can be closed as a hazardous waste facility as soon as approval for closure is received. Maximum amount of popcorn polymer at any given time is estimated to be 1000 lbs.

Closure of the facility can be accomplished in two weeks.

Incinerator

Popcorn polymer will be incinerated, at a rate within the limits of the capacity of the incinerator, such that no polymer remains. An ash sample will be analyzed for ash content to assure that no combustible material remains in the ash. The ash will be removed from the incinerator and disposed of in the city landfill which is the current approved practice.

File Memo
T-1823
Sept. 5, 1985
Page #2

The incinerator can be closed as a hazardous waste facility as soon as approval for closure is received.

Maximum inventory of ash at any given time during the life of the facility is estimated at 9000 pounds.

Closure of the facility can be accomplished in two weeks.

If closure is enacted by the company, the company is aware of its opportunity to submit written comments on the plan and request modification within 30 days of the date notice is required.

335.214 Time Allowed for Closure

Done June 2
The company will after generating the final volume of hazardous waste, or 90 days after approval of the closure plan, remove from the site or dispose of onsite all hazardous waste, in accordance with the approved closure plan. Closure activities will be completed within 180 days. The company may request approval of a longer closure period using procedures under 335.213(c) if it can be determined that he has taken and will continue to take all steps to prevent threats to human health and the environment from the unclosed but inactive facility.

335.215 Disposal or Decontamination of Equipment
See 335.212.

335.216 Certification of Closure

When closure is completed, the company will submit to the Executive Director certification by the company and an independent registered engineer that the hazardous waste facilities have been closed in accordance with specifications in the approved closure plan.

Keith Pearson
Keith Pearson,
Senior Process Engineer

Approved:

J. R. Mudd
J. R. Mudd, Plant Manager

KP/ra

cc: J. R. Mudd
J. Y. Brown
S. M. Bughdadi
R. W. Frase



Polymers Division, DiversiTech General, A GenCorp Company
Formerly -

THE GENERAL TIRE & RUBBER COMPANY

CHEMICAL DIVISION

ODESSA, TEXAS
79760

P.O. Box 2032

Telephone 1-915-33-21462

July 16, 1985
File T-1756

Mr. Charles E. Nemir
Executive Director
Texas Department of Water Resources
P. O. Box 13087 Capitol Station
Austin, Texas 78711

Re: Hazardous Waste Permit Application No. 10413
Solid Waste Registration No. 30252

Dear Mr. Nemir:

In order to improve the management of waste laboratory solvents in compliance with TAC regulations, we are upgrading our waste solvent facility from drum container storage to a tank storage. We hereby request permission to close the drum storage facility in accordance with the attached closure plan.

It is anticipated that the new tank facility will be completed such that the drum storage facility will receive no hazardous wastes after July 24, 1985. Waste solvents in the facility at that time will be collected by an approved carrier and disposed of in the Cecos International Class I disposal well to comply with 31 Texas Administrative Code (TAC) 335.69, accumulation time. Final disposition of the empty drums will be delayed until we have received your approval of the closure plan.

In order to bring the waste solvent facility into compliance by August 29, 1985, as required by the TDWR inspection of May 14, 1985, and closure at least 90 days after final receipt of hazardous wastes, we regret that notification of at least 180 days before the date of closure is not possible. Our notice of registration and Part A application will be revised reflecting these changes in operation.

We will appreciate your early and favorable reply. If you have any questions, please contact me at AC 915/335-7576.

Sincerely,

Keith H. Pearson
Senior Process Engineer

/bp

Attachments - 2

Xc → D-10 8/22/85



INTER-ORGANIZATION MEMO

TO: File Memo
ATTENTION: T-1747
FROM: Keith Pearson
DATE: July 11, 1985
SUBJECT: Closure Plan for Waste
Solvent Drum Storage Area.

The following closure plan is established for the waste solvent drum storage facility at the Odessa plant:

- 335.211 The hazardous waste facility as shown on our notice of registration is; 03 Container Storage Area, storage for less than 90 days of waste numbers 1H910090 (acetone), 1H911080 (methanol), 1H910060 (toluene), 1H910200 (trichloroethane or tetrachloroethane).
- 335.212 Closure of this facility will be conducted in a manner that minimizes need for further maintenance and eliminates to the extent necessary to protect human health and the environment, post-closure escape of any hazardous material to groundwater, or surface water or to the atmosphere.

335.213 Waste Solvent Drum Storage

In the event of closure or replacement, the drums used to contain waste solvents will be emptied by approved carrier and material disposed of in a Class I disposal well in accordance with TDWR provisions. The empty solvent drums will be triple rinsed for disposal by a drum reclaiming company.

It is planned to replace the drum storage with a tank facility in August, 1985.

Maximum volume of solvent at any given time during operation of the facility is 700 gallons.

Closure of this facility can be accomplished in two weeks.

The closure plan will be amended when changes in operations or facility design effect the closure plan, or when there is a change in the expected year of closure. The amendment will be made within sixty days of the change requiring the amendment.

If time allows, closure plans will be submitted to the Executive Director at least 180 days before the expected date of closure or no later than 15 days after interim status or issuance of a judicial decree order under Section 3008 of RCRA or Section 8 of the Solid Waste Disposal Act, Article 4477-7 to cease operation of the facility and close.

File Memo
T-1747
Page #2

If closure is enacted by the company, the company is aware of its opportunity to submit written comments on the plan and request modification within 30 days of the date notice is required.


335.214 Time Allowed for Closure

The company will, after generating the final volume of hazardous waste, or 90 days after approval of the closure plan, remove from the site or dispose of onsite all hazardous waste, in accordance with the approved closure plan. Closure activities will be completed within 180 days. The company may request approval of a longer closure period using procedures under 335.213(c) if it can be demonstrated that he has taken and will continue to take all steps to prevent threats to human health and the environment from the unclosed but inactive facility.

335.215 Disposal or Decontamination of Equipment -
See 335.212.

335.216 Certification of Closure

When closure is completed, the company will submit to the Executive Director certification by the company and an independent registered engineer that the hazardous waste facilities have been closed in accordance with specifications in the approved closure plan.


Keith Pearson,
Senior Process Engineer

Approved:


J. R. Mudd, Plant Manager

KP/ra

cc: J. R. Mudd
J. Y. Brown
S. M. Bughdadi
R. W. Frase

II

SR

HOURS

ATTACHMENT III

LOSS OF INTERIM STATUS
REGION VI EPA
R06-01-06

1. Reviewer: AA / SAF
2. Facility name: STANDARD INDUSTRIES
3. Address/location: P.O. BOX 27500
SAN ANTONIO, TX. 78227
4. EPA I.D. No.: TXD 990709685
5. Type of RCRA units requiring certification:

A. <u>S.I - SPRAY POND "H"</u>	H. _____
B. <u>S.I - SPRAY POND (PROPOSED) "J"</u>	I. _____
C. <u>L.F. - (PROPOSED) 2 CELLS</u>	J. _____
D. _____	K. _____
E. _____	L. _____
F. _____	M. _____
G. _____	N. _____

* Q 22

		Not
Yes	No	Determined

6. Is groundwater certification required? If yes, continue to Question 7. If no, go to Question 22.
7. Is financial assurance certification required? If yes, continue to Question 8. If no, go to Question 22.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | Yes | No | Not
Determined |
|---|-------------------------------------|--------------------------|--------------------------|
| 8. Was groundwater certification submitted? If yes, continue to Question 9. If no, answer Questions 9, 10, 11, and 12, and go to Question 20. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Was financial assurance certification submitted? If yes, continue to Question 10. If no, answer Questions 10, 11, and 12 and go to Question 20. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Is signature adequate? If yes, continue to Question 11. If no, answer Questions 11 and 12 and go to Question 22. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. Documentation available? | | | |
| a. Part A Submittal - Date: <u>3/18/85</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Part B Submittal - Date: <u>3/18/85</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Topographic Map - | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Section 3007 Response - Date: <u>11/27/85</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Closure Plan - Date: _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Post-Closure Plan - Date: _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g. RCRA Inspection - Date: _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h. Other - | | | |
| i. <u>Certification</u> Date: <u>Signed 8/7/85</u> | | | |
| ii. _____ Date: _____ | | | |
| iii. _____ Date: _____ | | | |
| iv. _____ Date: _____ | | | |
| v. _____ Date: _____ | | | |
| 12. Do all documents listed in Question 11 agree with the information shown in Question 5? If yes, continue to Question 13. If no, go to Question 22 and check with Project Manager before continuing with questionnaire. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. Does groundwater certification properly address all units listed in Question 5? If yes, continue to Question 14. If no, go to Question 22. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Yes No Not Determined

14. Does financial assurance certification (insurance and closure/post-closure) properly address all units listed in Question 5? If yes, continue to Question 15. If no, go to Question 22.

☒ ☐ ☐

15. Does insurance address both sudden and non-sudden occurrences? If yes, continue to Question 16. If no, go to Question 22.

☐ ☒ ☐

16. Which of the following options were used to demonstrate financial assurance for closure? Note: check yes for the appropriate method - it is not necessary to check No for those which do not apply.

Closure Cost
\$ 362,000

Assurance Insurance Available
Part B
L.O.C.
\$1,050,309

- a. Closure trust fund:
- b. Surety bond guaranteeing payment into a closure trust fund:
- c. Surety bond guaranteeing performance:
- d. Closure letter of credit:
- e. Closure insurance:
- f. Financial test/corporate guarantee:
- g. Multiple financial mechanisms:

☐ ☐ ☐
☐ ☐ ☐
☐ ☐ ☐
☒ ☐ ☐
☐ ☐ ☐
☐ ☐ ☐
☐ ☐ ☐

17. Which of the following options were used to demonstrate financial assurance for post-closure? Note: Check yes for the appropriate method - it is not necessary to check no for those which do not apply.

Post Closure Cost
\$ 50,500

Assurance Insurance Available
Part B
L.O.C.
\$1,050,309

- | | Yes | No | Not
Determined |
|--|-------------------------------------|-------------------------------------|--------------------------|
| a. Post-closure trust fund: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Surety bond guaranteeing payment into a post-closure trust fund: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Surety bond guaranteeing performance: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Post-closure letter of credit: | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Insurance: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Financial test/corporate guarantee: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g. Multiple financial mechanisms: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 18. ^{GROUNDWATER} Is certification considered complete? If no, explain in Question 22. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 19. Is financial assurance considered complete? If no, explain in Question 22. | Q. 15 <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 20. If the answer to Questions 8, 9, 18, or 19 is no, was a closure plan submitted? If yes, continue to Question 21. If no, go to Question 22. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 21. If the answer to Questions 8, 9, 18, or 19 is no, was a post-closure plan submitted? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 22. Briefly discuss the problems or discrepancies identified and determine if they are of a nature which prevents further review. | | | |

Q 19 No Non-Sudden insurance

Q 58,C These units are proposed.



HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT

INDUSTRY NAME: GENERAL TIRE & RUBBER COMPANY PHONE: (915) 332-1462SITE ADDRESS: P.O. BOX 2032 ZIP: 79760 COUNTY: EL PASOTDWR PERMIT OR REGIS. NO. 30252 EPA ID NO. TX0057422685INDUSTRY NAME GEN TIRE DISTRICT 10 DATE REPORT SUBMITTED 0589TYPE OF FACILITY G F T MAJOR/NONMAJOR M TYPE OF EVALUATION F0DATE OF EVALUATION OR ENFORCEMENT REFERRAL 04-23-84

Types Of Violations	Deg.	Date Of Notif. Letter	Date Of Inf. Enf. Act.	Date Response Due	Date Of Actual Compliance	Resolved/ Unresolved
GWM						
INC						
CLO	1	02-23-84				U
FIN						
PTB						
MAN						
SCH						
OTH						

COMMENTS:

* 0 1

1 3 5 9 11 13 15 19 21 23 25 29 31 33 35 39 41 43

45 49 51 53 55 59 61 63 65 69 71 73 75 79 81 83 85 89 91

Inspection of closure operation.NUMBER OF SAMPLES: 1

II

Name of Applicant: Standard Industries, Inc.

Application Received: 8-17-80

TDWR Permit No. HW50118 Page No. NPDES No. TX

Processing Rule No. 3A Type Facility HW

Application Administratively Reviewed by: Jesse Boultinghouse

Date Application Declared Administratively Complete: 3-18-85

Engineer Drafting Permit(s):

ERC DATE(Leave Blank for Permit Renewals):

() Refer for Hearing Scheduling
() Refer for Publication of Notice
() Refer for Final Consideration-Minor Amendment
() Refer for Permit Renewal
() Refer for Renewal of Confined Animal Permit
() Refer for Final Consideration-Production Area Authorization

Comments:

TEXAS WATER COMMISSION

Paul Hopkins, Chairman
Ralph Roming, Commissioner
John O. Houchins, Commissioner



Larry R. Soward, Executive Director
Mary Ann Hefner, Chief Clerk
James K. Rourke, Jr., General Counsel

July 22, 1986



Mr. Fred Humke
U. S. Environmental Protection Agency
Region VI - 6H-CE
1201 Elm Street
Dallas, Texas 75270

Re: Copies of documents from Diversitech General
Industrial Solid Waste Registration No. 30252

Dear Mr. Humke:

Transmitted herewith are copies of the documents you requested from the Diversitech General: Part A, Notice of Registration, Closure Plan, and Closure Certification.

Should you have any additional questions, please contact Betty S. Moore of Facility Unit III at AC512/463-8174.

Sincerely,

A handwritten signature in cursive script that reads "Minor Brooks Hibbs".

Minor Brooks Hibbs, Chief
Permits Section
Hazardous and Solid Waste Division

BSM:lab
Enclosures

RECORD OF COMMUNICATION

☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: Betty Moore
TWR

FROM: Fred Hunter

DATE 7/8/86

TIME 8:45

SUBJECT Diversified Gen. Tire & Rubbr
TXD057422685

SUMMARY OF COMMUNICATION

Facility was certified closed on April 15, 1986
~~Area consist of~~ White consist of

1. Drum storage area
2. Incinerator
3. Pajon folkies waste pile

CONCLUSIONS, ACTION TAKEN OR REQUIRED

He will send me copies of:

1. Hazardous waste notification letter
2. Part A application
3. Closure plan

INFORMATION COPIES

TO: file



HZ/RC/PE
TXD 057122655
6PD-R
6PD-0 ✓
GWQ

RECEIVED
2002 JUN 28 PM 4:29
AIR PERMITS SECTION
6PD-R

June 18, 2002

Mr. Jeffrey Saitas
Executive Director
Texas Natural Resource Conservation Commission
MC 109
P.O. Box 13087
Austin, TX 78711-3087

**SUBJECT: AMERIPOL SYNPOL CORPORATION ODESSA PLANT –
DECOMMISSION PLANT**

Dear Mr. Saitas:

This letter is a follow up to our letter to you dated March 21, 2002 that notified you of our intention to cease operations and idle our rubber manufacturing plant in Odessa, Texas. For various unavoidable business reasons, Ameripol Synpol Corporation (ASC) has chosen to decommission the Odessa facility. I am notifying the Texas Natural Resource Conservation Commission (TNRCC) of ASC's plan. Following is a brief description of our plan to decommission the plant.

BACKGROUND

The ASC Odessa Facility is located at 200 East Pool Road on a 288-acre tract in the southern portion of Odessa, Texas. The plant manufactured styrene butadiene rubber (SBR) in 75 and 90-pound bales. The facility has been in operation since 1957 and supplied SBR to markets in the United States and globally.

DECOMMISSIONING

During the period the plant was idled, the following activities were undertaken.

- ❑ All raw materials were removed from storage and either sent to our SBR facility in Port Neches, Texas for use or were sold.
- ❑ All plant chemicals used to support operations were either sent to Port Neches or were disposed of offsite in approved facilities.
- ❑ All Hazardous, Non-hazardous, Class I and Class II wastes either previously generated by plant operations or generated during the idling process have either been disposed of or are currently scheduled for disposal.
- ❑ Certain process storage tanks, piping and process units were cleaned to remove raw material and/or product residues.
- ❑ A survey was conducted to identify areas of the plant that contain asbestos containing materials (ACM).
- ❑ A plan was developed and implemented to clean and remove plant residues and wastes from chemical storage tanks, the ammonia refrigeration system, the catalyst system, plant wastewater sumps, ponds and trenches.

During the Decommissioning phase of the plant, we will conduct the following tasks according to the noted schedule:

- ❑ Continue to remove residues from chemical storage tanks, the ammonia refrigeration system, the catalyst system, plant wastewater sumps, ponds and trenches. We anticipate this activity will be completed by February 15, 2003.
- ❑ Properly dispose of all wastes generated during the period the plant is being decommissioned. We anticipate that all hazardous and Class I waste will be disposed of offsite by February 15, 2003.
- ❑ Develop a plan to close the brine ponds and dispose of the Class II waste accumulation in the ponds. We anticipate that the closure plan will be completed by September 30, 2002.
- ❑ Remove certain production and support equipment from the plant. Removal of any equipment will be contingent upon securing buyers or scrap outlets.

REGULATORY ISSUES

Air Emissions

The facility holds TNRCC Permit #17573 for emissions from 31 emission points identified in the permit. Standard exemptions were obtained for the following emission points:

- ☐ Brine cells
- ☐ Butadiene unloading facility
- ☐ Flare
- ☐ Butadiene storage spheres
- ☐ Vacuum styrene decanter
- ☐ Carbon black conveyor

A Title V Operating Permit application was submitted to the TNRCC for approval and received by ASC as being Administratively Complete on June 4, 2002. We will notify Jesse E. Chacon, P.E., Manager, Operating Permits Section, TNRCC, of our intent to cancel the permit in the application process, prior to entering into the public notice process that starts no later than July 4, 2002.

Waste Management

The facility operates using EPA I.D. No. TXD057422685 and Texas Solid Waste Registration Number 30252. The plant will continue to generate and dispose of wastes during the period of the decommissioning. New wastes generated during this time period will be added to the Notice of Registration (NOR) as appropriate. Required records such as manifests, waste profiles, etc. will remain onsite until such time as they are moved to an alternate location.

Water Management

The plant holds Permit #01042 issued by the City of Odessa to treat process wastewater. This permit will remain in place until the plant is decommissioned. At that time, the City of Odessa will be notified and the permit will be terminated.

The plant holds Permit #TX0117048 issued by the state of Texas for management of stormwater discharging through site outfalls #001, #002, and #003. This permit will remain in place until the plant is decommissioned. At that time, we will meet with the TNRCC to discuss the termination of this permit.

Mr. Jeffrey Saitas

June 15, 2002

Page 4

SPCC Plan, Hazardous Waste Contingency Plan

ASC will continue maintaining these plans until all oils and wastes are removed from the site and the decommissioning activities are complete.

We are being assisted in the decommissioning activities by E.Vironment, of Tomball, Texas

Please feel free to contact me if you have any questions.

FOR AMERIPOL SYNPOL CORPORATION



George Kwiatkowski
Vice President

cc: EPA Region 6
1445 Ross Avenue
Suite 1200
Dallas, Texas 75202